

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION**

KEITH HOBBS, individually and on  
behalf of others similarly situated,

Plaintiff,

v.

Apollo Interactive, Inc.

Defendant.

Case No. 4:19-cv-00057-CDL

JURY TRIAL DEMANDED

**DEFENDANT'S MOTION FOR LEAVE TO FILE COUNTERCLAIMS**

Defendant Apollo Interactive, pursuant to Rule 13 and 15(a) of the Federal Rules of Civil Procedure, moves the Court for leave to file counterclaims against Plaintiff. The reasons in support of Defendant's Motion are set forth fully in their Memorandum of Law filed contemporaneously herewith.

WHEREFORE, Defendant respectfully requests that this Motion be granted and that the Court grants it leave to file its counterclaims against Plaintiff.

Dated September 30, 2019.      Respectfully Submitted,

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*Counsel for Defendant Apollo  
Interactive, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the within and foregoing **DEFENDANT'S MOTION FOR LEAVE TO FILE COUNTERCLAIMS** with the Clerk of Court using the CM/ECF system, which will automatically send electronic mail notification of such filing to the following counsel of record:

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Submitted this 30th day of September, 2019.

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